

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION

JANE DOES 1-9,

Plaintiffs,

v.

COLLINS MURPHY, SHARON HAMMONDS,
BRENDA F. WATKINS, LIMESTONE
UNIVERSITY, MG, FREESITES, LTD., d/b/a
PORNHUB.COM, MG FREESITES II LTD.,
MINDGEEK S.A.R.L., MINDGEEK USA, INC.,
MG BILLING LTD., and HAMMY MEDIA
LTS. d/b/a XHAMSTER.COM,
TRAFFICSTARS LTD., WISEBITS LTD.,
XHAMSTER IP HOLDINGS LTD., WISEBITS
IP LTD.,

Defendants.

Civil Action Number: 7:20-cv-00947-DCC

**APPLICATION/AFFIDAVIT
*PRO HAC VICE ADMISSION***

JANE DOE,

Plaintiff,

vs.

LIMESTONE UNIVERSITY F/K/A
LIMESTONE COLLEGE, COLLINS MURPHY,
MG FREESITES, LTD., D/B/A
PORNHUB.COM, and HAMMY MEDIA LTD.
d/b/a XHAMSTER.COM,

Defendants.

CASE NO.: 7:21-cv-03193-DCC

**APPLICATION/AFFIDAVIT
*PRO HAC VICE ADMISSION***

JANE DOE 1, JANE DOE 2, JOHN DOE 1, and
JOHN DOE 2,

Plaintiffs,
v.

COLLINS MURPHY; LIMESTONE
UNIVERSITY; BRENDA F. WATKINS;
SHARON HAMMONDS; and MG FREESITES,
LTD. D/B/A PORNHUB.COM,

Defendants.

CASE NO. 7:22-CV-03576-DCC

**APPLICATION/AFFIDAVIT
PRO HAC VICE ADMISSION**

(1) Name: Diane Cafferata
First
Middle
Last

(2) Residence. I reside in the following state: California
If a South Carolina resident, indicate months/years of residence: _____

(3) Business Address. I am an attorney and practice law under the name of or as a member of the following firm:

Firm name: Quinn Emanuel Urquhart & Sullivan, LLP
Mailing address: 865 S. Figueroa St., 10th Floor
City/State/Zip: Los Angeles, CA, 90017
Telephone number: (213) 443-3000
Facsimile number: (213) 443-3100
E-mail address: dianecafferata@quinnmanuel.com
(Application will not be considered without an e-mail address to receive electronic notification.)

(4) Jurisdiction of this Court. I, by execution of this Application and Affidavit, consent and agree to comply with the applicable statutes, laws, and rules of the State of South Carolina, with all applicable federal statutes, laws, and rules, including Local Rules of the United States District Court for the District of South Carolina (particularly, Local Civil Rule 83.I.08 and/or Local Criminal Rule 57.I.08). I consent to the jurisdiction of the United States District Court for the District of South Carolina in all matters of attorney conduct.¹

(5) Regular Practice of Law. I am a member in good standing of the bar of the highest court of the District of Columbia or the State of California where I regularly practice law.
Attached is my certificate of good standing.

¹This District maintains a web site (www.scd.uscourts.gov) from which the federal and local rules of procedure and related materials may be obtained.

(6) Additional Bar Membership. I have been admitted to practice before the following courts: (List all of the courts Applicant has been admitted to practice before: United States District Courts; United States Circuit Courts of Appeals; the Supreme Court of the United States; and courts of other states or the District of Columbia.) By signing this Affidavit, I certify that I am a member in good standing of each of the listed bars unless otherwise noted.

Court Date Admitted Good Standing

State Bar of California 11/24/1997

Yes No
 Yes No

State Bar of Illinois 12/23/2019

U.S. District Court, Northern District of California 8/28/1998

Yes No

U.S. District Court, Eastern District of California 12/28/1999

U.S. District Court, Central District of California 1/18/2000

Yes No

U.S. Court of Appeals_Ninth Circuit 06/14/2006

Yes No

U.S. District Court, Southern District of California 12/05/2006

Yes No

U.S. District Court, Southern District of California 12/05/2006

Yes No

(7) Pending Disciplinary Matters. Are you presently the subject of any formal suspension or disbarment proceedings, and have you been notified by any disciplinary agency of the initiation of formal procedures? Yes No
 (If "yes," give particulars, such as jurisdiction, court, date, grounds. Information to comply with this paragraph may be provided *in camera* but that fact shall be revealed below.)

(8) Curtailment of Prior *Pro Hac Vice* Admissions. Have you ever had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked?

Yes No

(If "yes," give particulars, such as date, court, docket number, judge, circumstances; attach a copy of any order of denial or revocation.)

In 2001, my California client was sued in two class actions in Madison County, Illinois. My colleague and I sought pro hac vice admission in both cases. The Fifth District of Illinois –

Madison County denied one of them for each of us on the grounds that we could not have more than one pro hac admission and with the result that another colleague handled the second case.

In 2019, I was admitted to practice in all the Illinois state courts and am in good standing there.

(9) Sanctions. Have you ever had any certificate or privilege to appear and practice before any judicial or administrative body suspended or revoked, or received a public reprimand or greater sanction?

Yes No

(If "yes," give particulars, e.g., judicial or administrative body, date of suspension, and reinstatement.)

(10) Criminal Sanctions. Have you ever been convicted of a felony under the laws of the District of Columbia or of any State or under the laws of the United States?

Yes No

(If "yes," give particulars, such as date, court, judge, circumstances, and ultimate disposition.)

(11) Present and Previous *Pro Hac Vice* in this Court. Have you, within the last ten (10) years, filed an application to appear *pro hac vice* in the United States District Court for the District of South Carolina or another court in the state of South Carolina?

Yes No

(If "yes," give court, case name, docket number, and status of litigation, year of application, local counsel of record in each case, and state whether application is pending or was granted.) Attach additional pages if necessary.

(12) Designated Local Counsel. Local counsel of record associated with Applicant in this case is:

TURNER, PADGET, GRAHAM AND LANEY, P.A.
Post Office Box 1473
Columbia, South Carolina 29202
facsimile | 803-400-1542

Mark B. Goddard | Attorney ID: 09194
email | mgoddard@turnerpadget.com
direct | 803-227-4334

J. Kenneth Carter | Attorney ID: 05108
email | kcarter@turnerpadget.com
direct | 864-552-4611

I understand that local counsel of record is required to: (1) personally sign each pleading, motion, discovery procedure, or other document served or filed in this Court; (2) accept service of all pleadings and notices as required on behalf of all counsel for the party represented; (3) be present at all pretrial conferences, hearings and trials, unless excused by the Court; (4) be prepared to participate actively as may be necessary; and (5) assure compliance with Local Civil Rules 83.I.04, 83.I.05, and 83.I.06 or Local Criminal Rules 57.I.04, 57.I.05, and 57.I.06 as appropriate. Local counsel of record may attend discovery proceedings.

(13) Associated Counsel. In addition to local counsel designated above, the following counsel are also associated with the undersigned in this case.

(14) Application Fee. I affirm that the application fee of three hundred and fifty dollars (\$350) has been paid in accordance with Local Civil Rule 83.I.05 or Local Criminal Rule 57.I.05 or paid herewith.

(15) Electronic Notification. By submitting this application, I consent to electronic notification.

(16) Represented Party/Parties. I seek to represent the following party/parties: MG Freesites, LTD., MG Freesites II LTD., MindGeek S.A.R.L., MindGeek USA, Inc.

(17) I certify that I have read Local Civil Rule 30.04 regarding the conduct of depositions.

Diane Cafferata

Signature of Applicant

Sworn to and subscribed before me

this _____ day of _____, 20____.

SEE ATTACHED CERTIFICATE

A Notary Public
of the State of _____

My Commission expires: _____

State/Commonwealth of TEXAS)

City County of Dallas)

On 10/16/2023, before me, Sa'Myca Joenisia Leonard,
 Date Notary Name

the foregoing instrument was subscribed and sworn (or affirmed) before me by:

Diane Cafferata

Name of Affiant(s)

Personally known to me -- OR --

Proved to me on the basis of the oath of _____ -- OR --
 Name of Credible Witness _____

Proved to me on the basis of satisfactory evidence: _____
 driver license
 Type of ID Presented _____

WITNESS my hand and official seal.

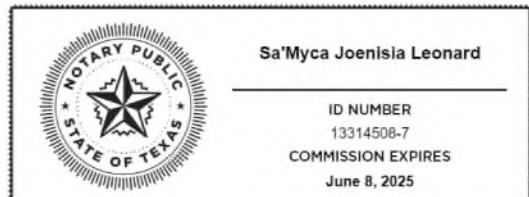
Notary Public Signature: Sa'Myca Joenisia Leonard
 Notary Public, State of Texas

Notary Name: Sa'Myca Joenisia Leonard

Notary Commission Number: 13314508-7

Notary Commission Expires: 06/08/2025

Notarized online using audio-video communication



Notarized online using audio-video communication

DESCRIPTION OF ATTACHED DOCUMENT

Title or Type of Document: APPLICATION/AFFIDAVIT PRO HAC VICE ADMISSION

Document Date: 10/16/2023

Number of Pages (including notarial certificate): 6